

Marc Wolstenholme  
5 Shetland Close  
Coventry, England CV5 7LS  
Telephone: 044 7827964404  
Email: [marc@mvwolf-fiction.co.uk](mailto:marc@mvwolf-fiction.co.uk)  
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

MARC WOLSTENHOLME,  
Plaintiff,  
vs.  
RIOT GAMES, INC.,  
Defendant

CASE NO. 2:25-CV-00053-FMO-BFM HON.

*Hon. Fernando M. Olguin*

DECLARATION OF MARC  
WOLSTENHOLME

PLAINTIFF MARC WOLSTENHOLME'S  
NOTICE OF CONCERN REGARDING  
SUDDEN DEPARTURE OF RIOT GAMES'  
COUNSEL AND REQUEST FOR  
LITIGATION HOLD

Dated this: March 17th, 2025

*M. WOLSTENHOLME.*  
[MARC WOLSTENHOLME]



Honorable Fernando M. Olguin

**TO THE COURT, DEFENDANT RIOT GAMES, INC., AND ITS  
COUNSEL OF RECORD:**

**INTRODUCTION**

Plaintiff Marc Wolstenholme respectfully submits this Notice of Concern regarding the sudden and unexplained departure of Defendant Riot Games, Inc.'s legal counsel Joshua Geller and Aaron Moss of Greenberg Glusker LLP. Plaintiff further demands a litigation hold be placed on all communications, emails, and documents involving these attorneys for potential review.

**FACTUAL BACKGROUND**

On March 12, 2025, Riot Games' counsel, Joshua Geller and Aaron Moss, actively engaged in case-related communications and discussions concerning the court-ordered settlement conference and related proceedings.

On March 14, 2025, Plaintiff raised concerns about Riot's conduct, including alleged procedural manipulation and misrepresentation to the Court regarding settlement discussions.



1 The Plaintiff File his concerns today- 17th March, 2025- PLAINTIFF MARC  
2 WOLSTENHOLME'S NOTICE TO COMPLY WITH PREREQUISITE REQUIREMENTS  
3 FOR SETTLEMENT DISCUSSIONS AND NOTICE OF RIOT GAMES' LEGAL TEAM'S  
4 DELIBERATE ATTEMPTS TO MANIPULATE COURT PROCEEDINGS.  
5

6 Shortly thereafter (17th March, 2025), Plaintiff received an automatic reply  
7 stating that both Joshua Geller and Aaron Moss are no longer with the firm, and all inquiries  
8 should be directed to Liz Moriarty at Greenberg Glusker LLP.

9 The timing of their sudden departure immediately following the disputed court  
10 filings and Riot's representations to the Court raises concerns regarding possible misconduct,  
11 ethical violations, or other irregularities related to their handling of this case.  
12

### 13 14 **REQUEST FOR CONFIRMATION OF NO MISCONDUCT**

15 Given the unusual circumstances of two primary defense attorneys leaving the  
16 firm simultaneously, as well as the alleged resignation of Christian Linke from Riot Games and  
17 the closing of Riot Forge, Plaintiff respectfully requests that the Court confirm the following:  
18

19  
20 That there has been no misconduct, misrepresentation, or improper conduct  
21 related to the withdrawal of Joshua Geller and Aaron Moss from this case.  
22

23 Whether their departure was related to any ethical concerns, conflicts of interest,  
24 or professional disciplinary actions involving this litigation.  
25



1 That Riot Games immediately discloses whether it has engaged new counsel or if  
2 Greenberg Glusker remains as lead counsel in this matter.

3  
4  
5 **LITIGATION HOLD REQUEST**

6 Plaintiff formally demands a litigation hold be placed on all communications,  
7 emails, documents, and internal correspondence related to:

8  
9 Joshua Geller and Aaron Moss's involvement in this case.

10 Any discussions between Riot Games, Greenberg Glusker LLP, and third parties  
11 regarding their departure.

12 Any potential instructions, recommendations, or communications regarding  
13 misrepresentation to the Court, procedural delays, or settlement conference manipulations.

14 Any and all privileged or non-privileged materials containing relevant  
15 information concerning the conduct of these attorneys in this litigation.

16  
17  
18  
19 Plaintiff requests that the Court order Defendant Riot Games, Inc. and Greenberg  
20 Glusker LLP to preserve and disclose all such materials for potential review. Any failure to  
21 preserve these documents may be deemed spoliation of evidence and subject to sanctions.



## CONCLUSION

For the reasons stated above, Plaintiff respectfully requests that the Court:

Acknowledge this Notice of Concern regarding the sudden removal of Riot Games' attorneys.

Confirm whether their departure is linked to misconduct or ethical violations in this case.

Issue a litigation hold order requiring preservation of all relevant communications and documents regarding their involvement in this case.

Compel Riot Games to disclose whether new legal counsel has been retained or whether Greenberg Glusker LLP remains responsible for the case.

Plaintiff reserves the right to seek further relief, including sanctions, if evidence of misconduct or improper legal tactics is uncovered.



1 I declare under penalty of perjury under the laws of the United States that the  
2 foregoing is true and correct.

3  
4 Executed on March 17, 2025, in Coventry, England.

5  
6  
7 Signature: *M. WOLSTENHOLME.*

8  
9 Marc Wolstenholme

10 Plaintiff in Pro Per

11 5 Shetland Close

12 Coventry, England CV5 7LS

13 [marc@mwwolf-fiction.co.uk](mailto:marc@mwwolf-fiction.co.uk)